### IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

# IN RE: NATIONAL PRESCRIPTION OPIATE LITIGATION

The County of Summit, Ohio, et al. v. Purdue Pharma L.P., et al., Case No. 18-op-45090

and

The County of Cuyahoga v. Purdue Pharma L.P., et al., Case No. 1:18-op-45004

**MDL No. 2804** 

Case No. 17-md-2804

Hon. Dan Aaron Polster

# DEFENDANTS' NOTICE OF FILING REDACTED DEPOSITION TRANSCRIPTS CITED IN MOTIONS FOR SUMMARY JUDGMENT AND *DAUBERT* MOTIONS PURSUANT TO ORDER AMENDING PROCEDURES REGARDING REDACTIONS AND FILING OF BRIEFS UNDER SEAL [DOCKET NO. 1813]

Pursuant to the Order Amending Procedures Regarding Redactions and Filing of Briefs Under Seal, dated July 5, 2019 [Dckt 1813], Defendants provide this notice of filing the attached deposition transcripts with proposed redactions, which are exhibits to the parties' motions for summary judgment and *Daubert* motions.

Dated: July 24, 2019 Respectfully submitted,

/s/ Mark S. Cheffo
Mark S. Cheffo
DECHERT LLP
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036
Tel: (212) 698-3500
Mark.Cheffo@dechert.com

Counsel for Defendants Purdue Pharma L.P., Purdue Pharma Inc., and The Purdue Frederick Company

Co-Liaison Counsel for the Manufacturer Defendants

/s/ Carole S. Rendon

Carole S. Rendon

**BAKER & HOSTETLER LLP** 

Key Tower 127 Public Square, Suite 2000

Cleveland, OH 44114-1214 Telephone: (216) 621- 0200

Fax: (216) 696-0740 crendon@bakerlaw.com

Counsel for Defendants Endo Health Solutions Inc. and Endo Pharmaceuticals Inc.; Par Pharmaceutical, Inc., and Par Pharmaceutical

Companies, Inc.

Co-Liaison Counsel for the Manufacturer **Defendants** 

/s/ Enu Mainigi

WILLIAMS & CONNOLLY LLP

Enu Mainigi

725 Twelfth Street, N.W.

Washington, DC 20005

Telephone: (202) 434-5000

Fax: (202) 434-5029 emainigi@wc.com

Counsel for Defendant Cardinal Health, Inc.

Co-Liaison Counsel for the Distributor Defendants

#### /s/ Shannon E. McClure

Shannon E. McClure

REED SMITH LLP

Three Logan Square

1717 Arch Street, Suite 3100

Philadelphia, PA 19103

Telephone: (215) 851-8100

Fax: (215) 851-1420

smcclure@reedsmith.com

Counsel for Defendant AmerisourceBergen Drug

**Corporation** 

Co-Liaison Counsel for the Distributor Defendants

#### /s/ Geoffrey Hobart

Geoffrey Hobart

**COVINGTON & BURLING LLP** 

One CityCenter, 850 Tenth Street, NW

Washington, DC 20001-4956

Telephone: (202) 662-5281

ghobart@cov.com

Counsel for Defendant McKesson Corporation

Co-Liaison Counsel for the Distributor Defendants

<u>/s/ Kaspar Stoffelmayr</u> Kaspar Stoffelmayr BARTLIT BECK LLP 54 West Hubbard Street Chicago, IL 60654 Telephone: (312) 494-4400 Fax: (312) 494-4440

kaspar.stoffelmayr@bartlitbeck.com

Counsel for the Walgreens Defendants

Liaison Counsel for the Chain Pharmacy Defendants

#### **CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that the foregoing document was served via the

Court's ECF system to all counsel of record on July 24, 2019.

/s/ Geoffrey Hobart
Geoffrey E. Hobart

Mark Lynch

## **COVINGTON & BURLING LLP**

One CityCenter 850 Tenth Street NW Washington, DC 20001 Tel: (202) 662-5281 ghobart@cov.com mlynch@cov.com

Counsel for McKesson Corporation

Co-Liaison Counsel for the Distributor Defendants